

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA, )  
v. ) Criminal No. 4:14-CR-103-RWP  
KENT L. SORENSEN, )  
Defendant. ) MOTION FOR DOWNWARD  
 ) DEPARTURE UNDER SENTENCING  
 ) GUIDELINES

The government respectfully moves this Court to depart downward from the United States Sentencing Guidelines (Guidelines) in sentencing defendant Kent L. Sorenson pursuant to Guidelines § 5K1.1 for his cooperation with and substantial assistance to the government. In light of (1) that substantial assistance, (2) the sentences already imposed by another District Judge of this Court upon defendant Sorenson's co-conspirators in *United States v. Benton, et al.*, No. 4:15-CR-103 (S.D. Iowa), and (3) the defendant's inability to pay a fine, the government recommends a downward departure to a sentence of no imprisonment, no home confinement, 80 hours or community service, and no fine, which is a sentence necessary to produce a punishment less severe than that already imposed on the leaders of the conspiracy, who went to trial.

Respectfully submitted,

RAYMOND N. HULSER  
Chief, Public Integrity Section

By:

/s/ Richard C. Pilger  
Richard C. Pilger  
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**CERTIFICATE OF SERVICE**

I hereby certify that on January 11, 2017, I electronically filed the foregoing with the Clerk of Court using the CM ECF system. I hereby certify that a copy of this document was served on the parties or attorneys of record by:

U.S. Mail              Fax              Hand Delivery

ECF/Electronic filing              Other means;

RAYMOND N. HULSER  
Chief, Public Integrity Section

By:              /s/ Richard C. Pilger  
Richard C. Pilger  
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